

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of

Amendment of Section 73.202(b)	)	
FM Table of Allotments,	)	
FM Broadcast Stations	)	
	)	MB Docket No. 02-199
	)	RM-10514
(Magnolia, Arkansas and Oil City,	)	
Louisiana)	)	

To: Chief, Media Bureau

**OPPOSITION TO REQUEST FOR EXPEDITED ACTION  
OF  
ACCESS.1 LOUISIANA HOLDING COMPANY LLC**

Access.1 Louisiana Holding Company LLC (“Access.1”),<sup>1</sup> licensee of commercial broadcast radio stations operating in the Shreveport Urbanized Area, pursuant to Section 1.45(b) of the Commission’s Rules, 47 CFR Section 1.45(b), hereby submits its Opposition to Request for Expedited Action filed January 8, 2004 jointly by Cumulus Licensing Company (“Cumulus”) and Columbia Broadcasting Commission., Inc. (“Columbia”), (collectively the “Joint Applicants”) in this proceeding.<sup>2</sup> Access.1 submits that the Joint Applicants have failed to demonstrate any basis in law or fact for granting the expedited relief they request.

In its Opposition to Request for Expedited Action filed simultaneously with the instant

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<sup>1</sup>Access.1 is the assignee of Access.1 Communications-Shreveport, LLC, former licensee and parent company of Access.1.

<sup>2</sup> Simultaneously with the filing of this Opposition to Request for Expedited Action, Access.1 is also submitting an Opposition to the Request for Expedited Action filed by the Joint Applicants in connection with an application for construction permit for KVMA-FM, File No. BPH-20030610ADI.

Opposition, Access.1 demonstrated that, stripped of all the rhetoric, the Joint Applicants' Request simply shows that, the Joint Applicants, for their private business reasons, do not choose to consummate the assignment of license of KVMA-FM from Columbia to Cumulus until the pending pleadings in this proceeding have been decided by the Commission. This is no basis for granting the extraordinary relief requested here.

WHEREFORE, for the reasons more fully set forth in its Opposition to Request for Expedited Action filed with respect to the Joint Applicants' construction permit application, Access.1 requests that the Bureau deny the relief requested by the Joint Applicants.

Respectfully Submitted,

**ACCESS.1 LOUISIANA HOLDING COMPANY LLC**  
By its Attorneys,

/s/James L. Winston  
James L. Winston  
Steven J. Stone  
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January 20, 2004

## **CERTIFICATE OF SERVICE**

I, Kathy Nickens, a secretary in the law firm of Rubin, Winston, Diercks, Harris & Cooke, L.L.P., do hereby certify that the foregoing "Opposition to Request for Expedited Action of Access.1 Louisiana Holding Company LLC" was mailed this 20th day of January 2004 to the following:

Peter Doyle, Chief\*  
Audio Division  
Media Bureau  
Federal Communications Commission  
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Kathy Nickens

January 20, 2004